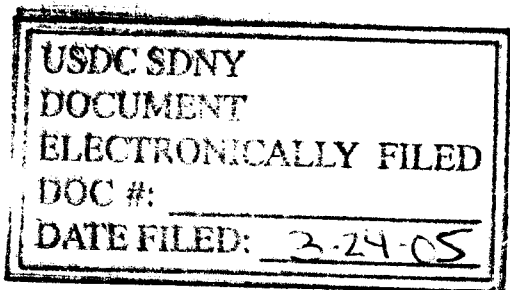


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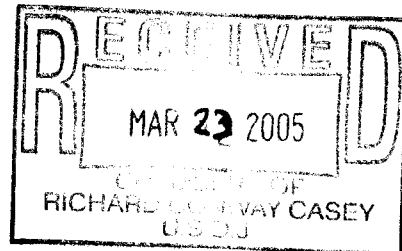


ECF

March 22, 2005

BY OVERNIGHT MAIL

Judge Richard Conway Casey  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street, Room 1950  
New York, New York 10007



Re: Continental Casualty Co. v. Al Qaeda Islamic Army, 04 Civ. 5970  
In Re Terrorist Attacks on September 11, 2001 03 MDL 1570

Dear Judge Casey:

This firm represents the plaintiffs in Continental Casualty Co. v. Al Qaeda, 04 Civ. 5970, which has been consolidated in the multi-district litigation In Re Terrorist Attacks on September 11, 2001 03 MDL 1570. We are writing to join the request of New York Marine and General Insurance Company ("New York Marine"), the plaintiff in the action entitled New York Marine and General Insurance Company v. Al Qaida, et al., 04-CV-6105, for a further extension of time to serve the defendants in this action pursuant to F.R.C.P. 6(b).

Plaintiffs commenced this action on September 1, 2004, to recover damages resulting from the terrorist attacks on September 11, 2001. As in the New York Marine action, the amended complaint asserts claims against hundreds of defendants located all over the world and including foreign nations and government officials, terrorist organizations, individual terrorists and other individuals, companies and organizations who aided the terrorist attacks on September 11, 2001. As in the New York Marine action, plaintiffs have engaged in a diligent and good faith effort to locate and serve each of the defendants. As in New York Marine action, plaintiffs previously requested and obtained a 90-day extension of time to effectuate service. However, as in the New York Marine action, we have still not been able to make service on all of the defendants at this time. As in the New York Marine action, the vast majority of defendants in this action have already been served or have agreed to accept service. As in the New York

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Marine action, virtually the only defendants upon whom service is not complete are a handful of foreign states and incarcerated defendants.

As in the New York Marine action, this extension of time, if granted, would only be the second extension granted to plaintiffs pursuant to F.R.C.P. 6(b). Accordingly, we respectfully join in the request of New York Marine for a second 90-day extension to allow plaintiffs to finalize service on the remaining defendants.

Respectfully submitted,

Robert M. Kaplan

SO ORDERED:

  
U.S.D.J.

cc: All Counsel (by e-mail)

*Granted - and  
Counsel is asked  
to provide the Court  
with a list of defendants  
for whom the extension to  
serve is requested.*

*3/24/05*